

UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

United States of America  
v.

Maicol Perez MARCELINO

Case No. 2:24-mj-248

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 11, 2024 in the county of Franklin in the  
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. 922(e)

did knowingly cause to be delivered to a contract carrier for transportation in interstate or foreign commerce, to persons other than licensed importers or manufacturers, a parcel that contained firearms, in violation of Title 18, United States Code, Section 922(e).

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

PAUL S MILL

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Date: 2024.05.11 21:44:29 -04'C

Complainant's signature

Paul Mills, Special Agent HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/11/2024

City and state: Columbus, Ohio

Kimberly A. Johnson

United States Magistrate Judge



**AFFIDAVIT**

I, Paul Mills, being duly sworn, hereby depose and state the following:

**INTRODUCTION**

1. Your Affiant is a sworn Special Agent with the United States Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI). Your Affiant has been a Special Agent with DHS since June of 2010. Your Affiant has been assigned to the HSI Columbus office since November 2019, where your Affiant has been involved with narcotics investigations. Prior to becoming a Special Agent with HSI, your Affiant was a Detective at Morrow County Sheriff's Office in Ohio beginning in February of 1999.
2. I am currently assigned to a group that investigates weapons smuggling, drug smuggling, and bulk cash smuggling. I am a law enforcement officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516(1), and in Title 21, United States Code, Section 878.
3. The information contained in this affidavit is submitted for the sole purpose of establishing probable cause that, on or about March 11, 2024, Maicol Perez MARCELINO ("MARCELINO") did knowingly cause to be delivered to a contract carrier for transportation in interstate or foreign commerce, to persons other than licensed importers or manufacturers, a parcel that contained firearms, in violation of Title 18, United States Code, Section 922(e). Title 18, United States Code, Section 922(e) prohibits any person knowingly and willfully delivering or causing to be delivered to any common or contract carrier for transportation or shipment in interstate

or foreign commerce, to persons other than licensed importers, licensed manufacturers, licensed dealers, or licensed collectors, any parcel or other container in which there is any firearm or ammunition without written notice to the carrier that such firearm or ammunition is being transported or shipped.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not contain all the information known to me and other law enforcement officers involved in this investigation. The facts and information contained in this affidavit are based on my personal knowledge and observations, as well as information received in my official capacity from other individuals, including other law enforcement officers involved in this investigation.

**PROBABLE CAUSE**

5. On or about March 11, 2024 according to closed circuit video surveillance footage MARCELINO to a shipping company in Columbus, Ohio, (“Company 1”), in the Southern District of Ohio, and placed an order with Company 1 to ship a parcel of goods from an address in Columbus, Ohio, in the Southern District of Ohio, to an address in Miami, Florida, in the Southern District of Florida. The address in Miami is a freight forwarder (“Company 2”) operating in the Southern District of Florida. Company 2 contracts a licensed U.S. Customs Broker (“Company 3”) operating in the Southern District of Florida, to transact international freight forwarding business on behalf of Company 2.
6. According to the shipping label printed on the parcel by Company 1, the individual that MARCELINO listed as the consignee of the parcel (“Conspirator 2”) is not an employee or associate of Company or 2, nor of Company 3. Conspirator 2 in the Dominican Republic contracted Company 2 to forward the parcel arriving to Company

- 2's address in the Southern District of Florida to ultimately get forwarded to Conspirator 2 in the Dominican Republic. According to the forms MARCELINO provided to Company 1, MARCELINO did not disclose to Company 1 that the parcel would contain firearms. As captured on closed caption video surveillance footage during MARCELINO's time inside Company 1's premises, an identification document was requested, and MARCELINO provided an company 1 false information regarding MARCELINO's real identity. Therefore Company 1 unknowingly transcribed a fake name for the shipper's name onto the shipping label.
7. On or about March 11, 2024, Company 1 accepted a parcel from MARCELINO, in the Southern District of Ohio. Company 1 closed caption video surveillance footage, records, and employee interviews, indicate Company 1 accepted the parcel while MARCELINO was inside Company 1's premises in person. MARCELINO paid in cash.
  8. Between March 11, 2024, and March 12, 2024, Company 1, in the Southern District of Ohio, transported the parcel to Company 2 address in the Southern District of Florida. The parcel shipment indicated Conspirator 2 as the consignee and only the address for Company 2. On or about March 12, 2024, according to Company 1 internal database tracking information, Company 2 received from Company 1 the parcel that MARCELINO shipped, with the name of Conspirator 2 indicated on the parcel.
  9. Company 2 identified through internal database checks that the parcel for Conspirator 2 needed to be routed for export outside the United States to a foreign destination in the Dominican Republic. According to internal Company 2 records, Conspirator 2 created an account and Conspirator 2 would pay cash on Delivery upon receipt of the

parcel in the Dominican Republic once Company 2 delivers the Parcel to the Dominican Republic.

10. On or about March 12, 2024, law enforcement inspected the parcel due to a request by security personnel at Company 2. Company 2 personnel based on the contractual obligations to Company 3, are authorized to detain and inspect parcels being forwarded to secure facilities, such as airports, airplanes et al. Company 2 security staff identified anomalies with the shipping records and weight related to this parcel and requested law enforcement assistance. Law enforcement personnel found 10 firearms, and 9 Pistol magazines hidden inside three plastic containers.
11. According to export documents, the shipper of the parcel was “MIGUEL WILLIAM (an Alias) AKA MARCELINO and the ultimate consignee was Conspirator 2.
12. Government database checks in the United States and the Dominican Republic indicate that neither MARCELINO nor Conspirator 2 are a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms.
13. On or About May 9, 2024, MARCELINO arrived at USCIS Ohio for a required immigration appointment.
14. MARCELINO was interviewed and stated that MARCELINO has not shipped parcels via common carriers. He was then shown a photo that had been taken from instore surveillance showing MARCELINO shipping the package, at which time he advised that he had shipped an number of packages but claimed to not know what was in the packages.

**CONCLUSION**

15. Based on the forgoing, I respectfully submit that there is probable cause to support a criminal complaint against MARCELINO for violation of Title 18, United States Code (USC), Section 922(e).

**PAUL S  
MILLS**

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Date: 2024.05.11 22:12:34 -04'01'

Paul Mills  
Special Agent  
Homeland Security Investigation

Subscribed and sworn to before me on this  
11th day of May 2024 in Columbus, Ohio.

  
Kimberly A. Johnson  
United States Magistrate Judge

